



U.S. Department of Justice

United States Attorney
Eastern District of Missouri

*Criminal Division
Violent Crime Unit*

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VIA ELECTRONIC MAIL AND SERVICE

Attorneys for Anthony Jordan
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In re: *United States v. Anthony Jordan*
Case No. S-5 4:15 CR 404 HEA
Notice Pursuant to Federal Rule of Evidence 404(b)

Dear Counsel:

This letter serves as notice that the United States of America intends to offer certain evidence at trial pursuant to Federal Rule of Evidence 404(b). In large part, the evidence set forth below is intrinsic to the offenses for which Mr. Jordan is charged. However, the United States is providing notice pursuant to Rule 404(b) out of an abundance of caution and to ensure admission of the evidence at trial.

Specifically, the United States intends to introduce evidence related to the following:

- August 28, 2004, unlawful use of a weapon (CN 04-070309);¹
- October 25, 2004, murder of Sherman Jefferson (CN 04-086410);
- December 28, 2004, murder of Orlando Jones and assault of Mark Anthony Anderson (CN 04-102949);
- November 1, 2006, trafficking drugs and resisting arrest (CN 06-090654);
- July 26, 2008, murder of Anthony Woods (CN 08-048942);

¹ All references are to Saint Louis Metropolitan Police Department complaint numbers unless indicated otherwise.

- September 16, 2008, search warrant execution at 4340 Maryland, Apartment C12 (CN 08-062208);
- May 20, 2012, murder of Montez “Tez” Woods (CN 12-025094);
- July 8, 2012, murder of Nicole Lang (CN 12-03443);
- November 10, 2012, murder of Cameron Smith (CN 12-058153);
- November 14, 2012, attempted murder of Derris Miller (CN 12-058937);
- December 13, 2012, kidnapping of Darrius Hunter and Damonte Fair (CN 12-063870);
- June 2, 2013, murder of Michael Brooks (Brooklyn, Illinois Police Department CN 13-349);
- July 1, 2013, attempted murder of Terrell “Hell Rell” Beasley and assault of Stephanie Harris (CN 13-0031925);
- August 5, 2013, attempted murder of Terrell “Hell Rell” Beasley and assaults of Erick Jones and Orlandris Sutherland (CN 13-038967);
- September 11, 2013, murder of Deandre Thomas (CN 13-046063);
- March 5, 2014, murder of Dion Stovall (CN 14-009263);
- April 2, 2014, murders of Michael Hennings and Ashley Townsend (CN 14-013577);
- May 5, 2014, attempted murder of Derris Miller (CN 14-019182)
- June 19, 2014, resisting arrest (CN 14-027106);
- In or about the summer of 2013, attempted murder of Lashaun “Nick” Wilson;
- In or about the summer of 2013, conspiracy to commit and/or attempted murder of Anthony Estell;
- January 1, 2002, to August 27, 2015, purchase of various firearms from private individuals to avoid providing verification of the purchaser’s true identity;
- January 1, 2002, to August 27, 2015, gaining access to a funeral home on one or more occasions wherein he, among other things, photographed one or more

deceased individuals in the care of the funeral home without the permission of the decedent(s)' next of kin, abused the corpse of decedent Terrell "Hell Rell" Beasley," and observed the body of decedent Anthony "Blinky" Clark;

- January 1, 2002, to August 27, 2015, engaging in a pattern of obstruction of justice by attempting to influence, obstruct or impede the due administration of justice including, but not limited to, making efforts to influence, threaten, or endanger one or more cooperating witnesses; disclosing or attempting to disclose to others the identity of one or more cooperating witnesses; and planning to harm the family member(s) of one or more cooperating witnesses;
- January 1, 2002, to August 27, 2015, possession with the intent to distribute and distribution of controlled substances, including, but not limited to, cocaine, cocaine base, heroin, and marijuana by Mr. Jordan and his co-conspirators.

Documents relating to the above-referenced incidents have been previously produced to you or, alternatively, are being produced. To the extent we receive additional records beyond those, we will promptly disclose that information to you.

Very truly yours,

JEFFREY B. JENSEN
United States Attorney



THOMAS REA
ERIN GRANGER
Assistant United States Attorneys
SONIA JIMENEZ
Trial Attorney, Capital Case Section

cc: Clerk of the Court, United States District Court for the Eastern District of Missouri